

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**GILBERTO RODRIGUEZ**, on behalf of  
himself, and all other similarly situated  
plaintiffs known and unknown,

Plaintiff

 $\mathbf{V}_s$ 

**HANSON LANDSCAPE & DESIGN A/K/A  
HANSON LANDSCAPE DESIGN &  
INSTALLATION INC. AND DUSTIN HANSON,  
INDIVIDUALLY,**

## Defendants

**No.** 17-cv-965

Honorable Judge Robert Blakey

***JURY DEMAND***

**JOINT MOTION FOR PRELIMINARY APPROVAL OF  
THE PARTIES' STIPULATION AND AGREEMENT TO SETTLE CLASS ACTION  
CLAIMS AND FOR APPROVAL OF CLASS CERTIFICATION**

Plaintiff Gilberto Rodriguez (“Plaintiff”), on behalf of himself and all others similarly situated, with the agreement of Defendants, moves this Court for an order preliminarily approving the Parties’ Stipulation of Settlement and Agreement to Settle Class Action Claims (attached to the accompanying memorandum, filed contemporaneously herewith as Exhibit 1) and an order approving class certification for settlement purposes, the form and manner of class notice (attached to the Stipulation of Settlement as Exhibit A), and scheduling a Fairness Hearing for final approval of settlement. In further support of this Joint Motion, the Parties have contemporaneously filed a memorandum in support, which is incorporated herein by reference.

Respectfully Submitted,

***Electronically Filed 5/18/2018***

s/ Neil Kelley  
Neil Kelley

## FARMWORKER AND LANDSCAPER

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